

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF DELAWARE

FILED

Aug - 9 2005

U.S. DISTRICT COURT
DISTRICT OF DELAWARE

Ernest A. Crump Jr,
plaintiff,

doc#3

v.

C.A. 04. 329-SLR

Robert May
et al
defendants,

PLAINTIFFS INTERROGATORIES - FIRST SET
TO DEENDANT THOMAS RYGIL

To the defendant, Thomas Rygil,
You are hereby notified to answer under oath, the interrogatories
numbered 1 to 13, inclusive as shown below, within 30 days of the
time service is upon you, in accordance with Rule 33 of the Federal
Rules of Civil Procedures.

Interrogatory No. 1. Is'nt it true that you along with the Emergency Response Team, apprehended the plaintiff on 08-29-02 and returned him back to Morris Community Correctional Center ?.

Interrogatory No. 2. Is'nt it true that you, along with another correctional officer, Administratively Transferred the plaintiff on 08-30-02 from Morris Community Correctional Center to Delaware Correctional Center ?.

Interrogatory No. 3. Is'nt it true that on 08-30-02, you personally took off the plaintiffs body the following items: his 2 rings, 2 necklaces, 1 watch, 1 pair of shoes, 1 shirt, 1 belt and pants ?.

Interrogatory No. 4. Is'nt it true that after you took the plaintiffs personal property off his body, you had him put on Department of Corrections clothes and sneakers ?.

Interrogatory No. 5. Is'nt it true that none of the plaintiffs personal property, including his Holy Quran, Kufi, Legalwork, Hygenic articles, or the items taken off his body by you, was transfered along with him when you administratively transfered him to Delaware Correctional Center on 08-30-02 ?.

Interrogatory No. 6. Were you ordered by a higher authority to take the plaintiffs personal property off his body at Morris Community Correctional center on 08-30-02 ?.

Interrogatory No. 7. If you answered yes to interrogatory No. 6. please state the name of the higher authority, if you answered no to interrogatory No. 6. then go to interrogatory No. 8..

Interrogatory No. 8. So the decision to take the plaintiffs personal property off his body was your decision ?.

Interrogatory No. 9. What did you do with the plaintiffs personal property that you took off his body ?.

Interrogatory No. 10. On 08-30-02, did you have control and/or possession, at any time, over or of the plaintiff other personal property, in particular; his Holy Quran, his Kufi, Legalwork and Hygenic articles ?.

Interrogatory No. 11. If you answered yes to interrogatory No. 10, what did you do with that property ?., if you answered no to interrogatory No. 10. , then go to interrogatory No. 12.

Interrogatory No. 12. Who had control of the property stated in interrogatory No. 10. ?.

Interrogatory No. 13. Is'nt it true that the plaintiffs personal property, in particular, his Holy Quran, Kufi, Hygenic articles, and his jewelry and watch taken off his body by you, could have been transferred along with him when he was Administratively Transferred to Delaware Correctional Center on 08-30-02 ?.

Dated: 06.27, 2005


PLAINTIFF

Address: Delaware Corr. Center
1181 Paddock Road
Smyrna, Delaware 19977